

The Reynolds Group Job Applicant Privacy Notice

The Group is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

Data controller

The Group is a data controller, meaning that it determines the processes to be used when using your personal data. As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date (as provided by you)
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

What information does the Group collect?

We collect a range of information about you, this includes:

- Name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements
- Whether or not you have a disability for which the group needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK.

We may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The group will seek reference information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does The Group process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The group has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Special categories of data

The group may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.

If you have a medical condition or disability which may require special facilities or support at interview we will only use this information for the purpose of providing any necessary adjustments in accordance with equality legislation, to ensure compliance with employment law and making decisions regarding your fitness for work.

For some roles, the group is obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

How long does the Group keep data?

If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 6 months in order to be considered for other positions or not.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Group will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with former employers to obtain references for you.

For certain roles, (specifically drivers) we will contact employment background check providers to obtain necessary background checks and where relevant the Disclosure and Barring Service to obtain necessary criminal records checks. These checks will be run during the recruitment process to determine whether an offer of employment will be made.

We will not transfer your data outside the European Economic Area unless prior notification is provided. Where we do share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How does the Group protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request
- require the group to change incorrect or incomplete data
- require the group to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where the group is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the HR department at HRStaffs@reynolds-cs.com.

If you believe that the Group has not complied with your data protection rights, you can complain to the Information Commissioner (ICO).

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the group during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated decision-making

Our recruitment processes are not based solely on automated decision-making.

We reserve the right to amend and update this notice as required. For the avoidance of doubt, this notice does not form part of colleague's contracts of employment.